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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 VICTOR RAMON WRIGHT,

18 Defendant.

19 Case No. 2:21-CR-00024-APG-DJA

20 **STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(First Request)

21 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
22 Acting United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel
23 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Shari
24 L. Kaufman, Assistant Federal Public Defender, counsel for Victor Ramon Wright, that the
25 previously ordered deadline for filing of pretrial motions be vacated and that the parties herein
26 shall have to and including July 9, 2021, within which to file the Defendant's pretrial motions
currently due June 10, 2021.

27 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
28 shall have to and including July 23, 2021, to file any and all responsive pleadings, currently due
29 June 24, 2021.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including July 30, 2021, to file any and all replies to dispositive motions,
3 currently due July 1, 2021.

4 The Stipulation is entered into for the following reasons:

5 1. Counsel for the defendant needs additional time to conduct investigation and
6 attempt to resolve potential motions and charges short of litigation.

7 2. The defendant is not incarcerated and does not object to the continuance.

8 3. The parties agree to the continuance.

9 4. The additional time requested herein is not sought for purposes of delay, but
10 merely to allow counsel for defendant sufficient time within which to discuss the proposed
11 resolution with her client.

12 5. Additionally, denial of this request for continuance could result in a miscarriage
13 of justice.

14 This is the first stipulation to continue filed herein.

15 DATED this 17th day of June, 2021.

16 RENE L. VALLADARES
17 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

18 /s/ *Shari L. Kaufman*
19 By _____
20 SHARI L. KAUFMAN
Assistant Federal Public Defender

18 /s/ *Daniel J. Cowhig*
19 By _____
20 DANIEL J. COWHIG
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
VICTOR RAMON WRIGHT,
Defendant.

Case No. 2:21-CR-00024-APG-DJA

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to conduct investigation and attempt to resolve potential motions and charges short of litigation.

2. The defendant is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to discuss the proposed resolution with her client.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including July 9, 2021, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including July 23, 2021, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including July 30, 2021, to file any and all replies to dispositive motions.

DATED this 21st day of June, 2021.

[Signature]
UNITED STATES MAGIS

UNITED STATES MAGISTRATE JUDGE